

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of

FourWorld Event Opportunities, LP,

Petitioner, for an Order pursuant to 28 U.S.C. § 1782 to
Conduct Discovery for Use in a Foreign Proceeding.

Case No. 25-mc-00061-MKV

~~PROPOSED~~ ORDER

This matter comes before the Court upon the Application for Judicial Assistance by FourWorld Event Opportunities, LP (“Petitioner”) for leave to serve subpoenas upon Brookfield Wealth Solutions Ltd., formerly known as Brookfield Reinsurance Ltd., and Lorenzo Lorilla (together, “Respondents”), pursuant to 28 U.S.C. § 1782 (the “Application”).

The Court, having considered the Application and the supporting materials thereto, as well as the parties’ joint status update on April 28, 2025,

IT IS HEREBY ORDERED that:

1. The Application is granted, and Petitioner is authorized to take discovery from Respondents by issuing the subpoenas and seeking the production of documents and a deposition from each Respondent in the form attached to the Loft Declaration as Exhibits 1 and 2, ECF Nos. 2-1, 2-2 (the “Subpoenas”);

2. Respondents have accepted service of the Subpoenas while reserving all rights pursuant to the terms of the parties’ prior meet and confers and the Federal Rules of Civil Procedure;

3. For the avoidance of doubt, nothing in this order affects Respondents’ right to object to the scope of the Subpoenas under Federal Rule of Civil Procedure 45 or the right to object to the taking of a deposition (on May 12, 2025 or otherwise);

4. The parties shall meet and confer in good faith on a mutually agreeable protective order to govern Respondents' discovery and, prior to the entry of such an order, Petitioner must treat any produced documents as attorneys' eyes only;

5. As to the document portions of the Subpoenas, Respondents shall make an initial production of responsive documents by April 28, 2025 and shall serve any responses and objections by May 12, 2025;

6. As to the deposition portions of the Subpoenas, Petitioner shall, following its review of Respondents' document productions, indicate to Respondents whether it still intends to take a deposition of one or more Respondents, after which the parties shall meet and confer about the issue;

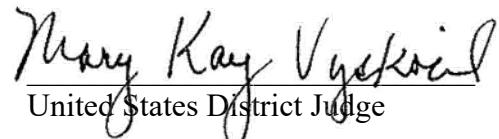
7. In the event the parties are unable to resolve their dispute over the taking of a deposition through the meet and confer process discussed in paragraph 6, Respondents preserve the right to file a motion to quash the deposition(s);

8. ~~Any disputes over the scope of discovery pursuant to the Subpoenas shall be raised with the Court through the Court's discovery dispute process set out in Section 3(D) of the Court's Individual Rules of Practice in Civil Cases, and~~

9. ~~The Court shall retain jurisdiction over this matter for the purpose of enforcing this Order and assessing any supplemental request for discovery assistance that may be requested by Petitioner.~~

The Clerk of Court is respectfully requested to terminate the motion pending at docket entry ECF No. 1 and to close this case. If the parties have further disputes they can bring a separate action.

DATED this May day of 5, 2025.



United States District Judge